

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

IN RE POLYURETHANE FOAM ANTITRUST  
LITIGATION

This document relates to:

ALL CASES

MDL Docket No. 2196

Index No. 10-MD-2196 (JZ)

JUDGE JACK ZOUHARY

**CROSS-NOTICE OF RULE 30(b)(6) DEPOSITION TO VITAFOAM, INC., VITAFOAM  
PRODUCTS CANADA LIMITED, AND BRITISH VITA UNLIMITED**

TO: ALL COUNSEL OF RECORD

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, please take notice that Plaintiffs General Motors LLC, LaCrosse Furniture Co., CAP Carpet Inc., Indirect Purchaser Plaintiffs, and certain other Plaintiffs, will take the oral deposition of Vitafoam, Inc., Vitafoam Products Canada Limited, and British Vita Unlimited on the subject matters set forth in Defendants' Second Amended Notice of Deposition Pursuant to Rule 30(b)(6) to Vitafoam, Inc., Vitafoam Products Canada Limited, and British Vita Unlimited, Exhibit A.

The deposition will commence at 9:00 a.m. local time on March 18, 2014, at the offices of Freshfields Bruckhaus Deringer US LLP, 701 Pennsylvania Ave NW #600, Washington, DC 20004. The deposition shall continue from day to day until completed in accordance with the Federal Rules of Civil Procedure and the orders of this Court.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Vitafoam, Inc., Vitafoam Products Canada Limited, and British Vita Unlimited shall designate a person or persons prepared to testify about the topics set forth in Defendants' Second Amended Notice of

Deposition Pursuant to Rule 30(b)(6), Exhibit A. All parties are invited to attend. The deposition will be conducted under oath and will be recorded by stenographic means and by videotape.

Dated: March 11, 2014

Respectfully submitted,

/s/ Chahira Solh

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th of March 2014, a copy of the foregoing **CROSS-NOTICE OF RULE 30(b)(6) DEPOSITION TO VITAFOAM, INC., VITAFOAM PRODUCTS CANADA LIMITED, AND BRITISH VITA UNLIMITED** was served electronically on counsel for Vitafoam, Inc., Vitafoam Products Canada Limited, and British Vita Unlimited and lead counsel for Plaintiffs pursuant to Paragraph 10 of this Court's January 20, 2011 Initial Case Management Conference Order, ECF No. 17.

I also hereby certify that on March 11, 2014, a copy of the foregoing document was served via ECF.

Dated: March 11, 2014

*/s/ Chahira Solh*

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